

Trotter, Vera

Trotter, Vera on 8/22/2014 (11:16-11:20)

16 Q. And what about now; how -- what is your primary
17 form of transportation?

18 A. Public transportation, like, they offer
19 services for adults, for senior adults, medical services,
20 and then the DART Paratransit.

Trotter, Vera on 8/22/2014 (14:21-15:13)

21 Q. Okay. And do you get rides from anyone else,
22 any friends or family in the area?

23 A. Yes, I have some family who takes me to the
24 grocery store and stuff like that and -- what else,
25 does -- Lisa take me to the beauty shop to get my hair

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1 shampooed and pressed. And --

2 Q. And -- go ahead. Sorry.

3 A. No, that's just, you know, shopping for general
4 things you need at the house.

5 Q. Okay. And those folks who give you rides, are
6 they pretty flexible? If you need a ride you can call
7 and ask and someone's available to take you --

8 A. Yeah.

9 Q. -- typically?

10 A. Yeah. They're pretty -- I have a lot of family
11 around there --

12 Q. Okay.

13 A. -- where I live.

Trotter, Vera on 8/22/2014 (35:23-36:1)

23 Q. Okay. And you mentioned that you have an
24 expired driver's license and it expired November 5th of
25 2012; is that correct?

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1 A. Uh-huh.

Trotter, Vera on 8/22/2014 (44:13-44:16)

13 Q. And just to verify, this is an accurate -- this
14 is -- this is your Voter Registration Card; is that
15 correct?

16 A. Yeah.

Trotter, Vera on 8/22/2014 (73:19-73:20)

19 Q. Do you have a social security card?

20 A. Uh-huh. But I don't carry that with me.

Trotter, Vera on 8/22/2014 (50:16-50:18)

16 Q. Okay. And do you agree that you qualify to
17 vote by mail here in Texas?

18 A. Yeah.

Trotter, Vera on 8/22/2014 (48:21-49:8)

21 Q. Okay. Well, and you said that this -- this
22 last -- the May 2014, I guess it was the primary runoff



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23 you voted by mail?

24 A. Yeah.

25 Q. And -- and can you tell me a little bit about

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1 the process that you went through in order to do that,

2 what kind of forms you had to fill out and things like

3 that?

4 A. They sent this -- they sent two packets, and

5 they -- and an instruction sheet and you go through in

6 the balloons and you color in the balloons with what do

7 you choose, put it back in the envelope, seal it up, and

8 mail it.

Trotter, Vera on 8/22/2014 (69:14-69:20)

14 Q. Ms. Trotter, I'm handing you what's been marked

15 as Exhibit 5.

16 A. Okay.

17 Q. Does this look like the letter that you

18 received notifying you that your vote had been counted?

19 A. Yeah, this -- this is what I was waiting on to

20 see if it had counted.

Trotter, Vera on 8/22/2014 (70:12-70:16)

12 Q. And so when you received this letter, was it

13 your understanding that your vote had been counted --

14 A. Uh-huh.

15 Q. -- for the March the 2014 primary election?

16 A. Yeah.

Trotter, Vera on 8/22/2014 (73:7-73:11)

7 Q. So do you understand that since you've obtained

8 an Election Identification Certificate and you're over 70

9 that your Election Identification Certificate will never

10 expire?

11 A. No, I didn't know that.

Trotter, Vera on 8/22/2014 (74:8-74:16)

8 Q. Okay. But you -- I think you said you were

9 only at the DPS office for about how long?

10 A. Yeah, it wasn't -- it probably 20 minutes --

11 Q. Okay.

12 A. -- because I was surprised that there weren't a

13 lot of people out there be -- for the voters ID thing. I

14 thought it was going to be more of a crowd than that, and

15 they opened especially just for that on Saturday. They

16 weren't doing anything else.

Trotter, Vera on 8/22/2014 (101:8-101:11)

8 Q. Okay. And so you personally have never visited

9 the Department of Public Safety's Web site, have you?

10 A. One time to find out about the driver's license

11 thing.

Trotter, Vera on 8/22/2014 (79:11-79:25)

11 Q. Do you have any plans to obtain a personal

12 identification card?

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13 A. Yeah, I do, because of the driver's license
14 situation, I won't be able to drive.

15 Q. And do you understand that a personal
16 identification card is -- is a form of identification
17 that you can present at the polls in order to vote in
18 person?

19 A. I didn't know that, but -- but I -- I do plan
20 to get one of those identifications.

21 Q. And are you aware that you can present a -- an
22 expired driver's license up -- expired up to two years
23 and -- as a form of identification in order to get a
24 person --

25 A. No, I didn't -- I didn't know that.

Trotter, Vera on 8/22/2014 (81:17-81:18)

17 Q. So this is a brochure that I -- I printed off
18 of the DPS, Texas Department of Public Safety Web site.

Trotter, Vera on 8/22/2014 (84:5-84:12)

5 Q. Okay. Thank you. And do you see underneath
6 that Verify your identity, it says, Photo IDs issued by
7 government agencies are considered primary documents.
8 Simply show one from the list below to prove your
9 identity?

10 A. Yes.

11 Q. Okay.

12 A. I see that.

Trotter, Vera on 8/22/2014 (85:12-85:25)

12 Q. But is it your understanding from -- from
13 reading what you just read that presenting a Texas photo
14 driver's license within two years of expiration is an
15 identification card you can show in order to get a per --
16 a photo ID card, a personal ID card in Texas?

17 A. I think it is.

18 Q. Okay. And do you understand that that is all
19 that you need to show in order to get a personal ID card
20 in Texas?

21 A. Yeah.

22 Q. Okay. And do you agree that your Texas
23 driver's license has not yet been expired for two years?

24 A. No, I didn't. This was a -- I'm just learning
25 this.

Trotter, Vera on 8/22/2014 (86:17-86:21)

17 Q. What I'm -- what I'm asking you -- what I'm
18 asking you is -- is do you agree that your Texas driver's
19 license expired November 5th of 2012?

20 A. Yeah. I -- yeah, from the reading the license,
21 yeah.

Trotter, Vera on 8/22/2014 (87:22-88:5)

22 Q. So you agree that you would like to obtain a
23 Texas personal identification card?

24 A. Yeah.

25 Q. Okay. And do you have plans to obtain one in

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1 the next few months?

2 A. Yeah.

3 Q. Okay. When -- when do you plan to do that?

4 A. Since I just found out, I'm going to try to do

5 it next week.

Trotter, Vera on 8/22/2014 (105:4-105:24)

4 Q. Ms. Trotter, are you aware that in -- an

5 individual over 60 years or over in the state of Texas

6 can obtain a personal identification card for \$6?

7 A. No, I didn't.

8 Q. Okay. If I -- if I represent to you that an

9 individual over 60 in Texas can obtain a personal

10 identification card for \$6, would that pre -- would that

11 cost prevent you from obtaining that personal

12 identification card?

13 A. No. Even the 10 wouldn't have -- wouldn't, you

14 know.

15 Q. And are you aware that an individual over 60

16 who -- who obtains a personal identification card, that

17 personal identification card will never expire?

18 A. No, I didn't.

19 Q. And if I represent to you that that is the

20 case, that an individual over 60 who obtains a personal

21 identification card, that identification card never

22 expires, does that make you want to obtain a personal

23 identification card?

24 A. Yeah.